

EBASCO SERVICES INCORPORATED

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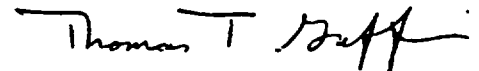
Mr. Nigel Robinson, Project Manager
U.S. Environmental Protection Agency
26 Federal Plaza, Room 747
New York, New York 10278

Re: ASBESTOS DUMP SITE
MORRIS COUNTY, NEW JERSEY

Dear Mr. Robinson:

We are pleased to submit our review of the Draft Feasibility Work Plan for the Asbestos Dump Site prepared by Fred C. Hart Associates for National Gypsum Company. If you have any questions concerning this review, do not hesitate to call me at (201) 460-6194.

Very truly yours,



Thomas T. Griffin, P.E.
Site Manager

TTG:dmg

cc: D Sachdev

EBASCO SERVICES INC. REVIEW OF
"DRAFT FEASIBILITY STUDY WORK PLAN
FOR THE ASBESTOS DUMP SITE, MORRIS
COUNTY, NEW JERSEY, FEBRUARY 29, 1988"
PREPARED BY FRED C. HART, ASSOCIATES

INTRODUCTION

Ebasco Services, Inc. has conducted an evaluation of the Draft Feasibility Study Work Plan for the Asbestos Dump Site in Morris County, New Jersey. This work is in accordance with the United States Environmental Protection Agency (EPA) REM III Contract No. 68-01-71250 to Ebasco Services. The criteria for this evaluation were governed by the National Oil and Hazardous Substance Pollution Contingency Plan (NCP) (40 CFR Part 300.68) and EPA's guidance on Feasibility Studies.

SUMMARY

The Draft Work Plan submitted for review addresses only one of the four locations that comprise the Asbestos Dump Site. The location that is the subject of this Draft Work Plan is the Millington Site, where the former National Gypsum Plant was located. The remaining three locations (i.e., Great Swamp Site, 257 New Vernon Road Site and White Bridge Road Site) will be the subject of a future Feasibility Study.

The Draft Feasibility Study Work Plan summarizes existing conditions observed at the Millington Site based upon previous studies, describes the tasks to be undertaken to provide for potential remedial action alternatives and identifies a schedule for completion of the Feasibility Study. However, our review of these items indicates certain deficiencies with respect to a) description of existing conditions and b) criteria to be employed as part of the remedial alternative detailed evaluation process.

The first item, description of existing conditions, pertains to the "Introduction" on pages 1 and 2 of the Draft Work Plan. This section neglects to reference the extensive Remedial Investigation documents completed as part of the studies conducted at the Millington Site. In addition, the description of the analytical results is confusing. Maps and tables should be added to clarify the locations of samples, relate observed concentrations to background levels, and summarize the relationship of analytical observations to potential remedial actions. For example, there is no indication of ground water contamination, yet ground water treatment technologies are included as a remedial action alternative.

The second item, criteria to be employed as part of the remedial alternative detailed evaluation process, pertains to Task 4 in the Draft Work Plan. In a memorandum from J. Winston Porter,

Page 3: The Work Plan lacks the definition of remedial objectives or the approaches to define such objectives.

Page 4: This page was not received.

Page 5, Paragraph 5: The statement is made "The list will be reduced or expanded, depending on the results of the site investigation". Are additional site investigations planned for the Millington site as part of the Feasibility Study or is this a reference to continued monitoring following completion of the Remedial Investigation?

Page 7, Paragraph 4: The definition of steep side slopes as being greater than 40 feet is not clear. Side slopes should be provided as a percentage or units of feet/foot.

Page 9, Paragraph 6: The "Detailed Analysis of Remaining Alternatives" must explicitly address the nine criteria previously listed in this review.

Page 11: There is no mention of the air sampling addendum in the Work Plan. How is it related to the Feasibility Study process? Page 3 stated that air sampling results were within acceptable limits.